

**Lauren Rotonda**

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**From:** joeromero01@comcast.net  
**Sent:** Tuesday, August 1, 2023 7:38 AM  
**To:** Lauren Rotonda  
**Cc:** Elaine Y Ramirez (Work)  
**Subject:** U.S. v. Padilla, No. 19-CR-3113

**CAUTION - EXTERNAL:**

Lauren,

Hope all is well. As you may be aware, counsel for Mr. Padilla has filed a motion to recuse (Doc. 546) in their Padilla case (No. 22-CR-634) Previously in my case, opposing counsel (AUSA Elaine Ramirez) and I, with the Court's concurrence, had agreed on an informal stay of the motion to recuse I filed in Case No. 19-CR-3113. As defense counsel and Mr. Padilla Case No. 22-CR-634 have now, or very recently, filed a similar motion to recuse in its Padilla case, have informed Ms. Ramirez that I will ask for the informal stay to be lifted and she should respond to my motion to recuse. Further, as the factual and legal basis for the recusal motion filed in both cases are identical, I'm assuming that should the Court decide to schedule a hearing on said motion, a joint hearing may be appropriate.

-JMR

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